

SUPPORTING STATEMENT

Sponsor's Notice of Change of Address, Form I-865

OMB No. 1615-0076

A. JUSTIFICATION:

1. The Illegal Immigration Reform and Immigrant Responsibility Act of 1996 created a section 213A of the Immigration and Nationality Act (Act). Section 213A requires every sponsor to notify the U.S. Citizenship and Immigration Services (USCIS) and the State, in which the sponsor is currently a resident, of his or her new address within thirty (30) days of any change of address. The sponsor will meet this obligation by filing this form with the USCIS; as information on the sponsor will be provided through the USCIS' established system for verifying alien status, the notification to the State will be considered to have been met.
2. The data collected on Form I-865 will be used by an entity that has provided any means-tested public benefit to a sponsored alien to locate and require reimbursement from the sponsor for an amount equal to the unreimbursed costs of the provided benefits.
3. The use of Form I-865 provides the most efficient means for collecting and processing the required data. In this case the USCIS does not employ the use of information technology in collecting and processing information. Currently, the USCIS does not have the automated capability in place to accept electronic submission of applications. However, the forms are available on the USCIS website for downloading.
4. A review of the USCIS Forms Inventory Report revealed no duplication of effort, and there is no other similar information currently available which can be used for this specific purpose.

5. This collection of information does not have an impact on small businesses or other small entities.
6. If the information is not collected, providers would not have information on a means-tested public benefit, and it may prove difficult to pursue the reimbursement of unreimbursed costs from sponsors of aliens.
7. The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.
8. Public comments cannot be addressed in this submission. Any public comments will be reconciled and addressed in the justification package.
9. The USCIS does not provide payment or gifts to respondents in exchange for a benefit sought.
10. There is no assurance of confidentiality.
11. There are no questions of a sensitive nature.
12. **Annual Reporting Burden:**

No. of respondents	100,000
No. of responses per respondent	1
Total Annual Responses	100,000
Hours per response	.233
Total Annual Reporting Burden	23,300

Total Public Cost	\$ 233,000
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The projected hours per response for these collections were derived by breaking the process into three basic components:

Learning about law and form	5 Minutes
Completion of form	4 Minutes
Assembling and filing form	5 Minutes
Total Hours per Response	14 Minutes (.233)

For the first two components, we used tests to determine completion times. People who were not conversant with immigration processes were used to determine average completion time. The third component to the process was based on the mailing of the form from the submitter's residence.

Annual Reporting

The total annual reporting burden hours are 23,300. This figure was derived by multiplying the number of respondents (100,000) x the frequency of response (1) x the hours per response (14 minutes or .233).

Public Cost

The estimated annual public cost of this information collection is \$233,000. This figure is based on the number of respondents (100,000) x the response time of 14 minutes (.233 hours per response) x \$10 (average hourly rate).

13. There are no capital or start-up costs associated with this information collection. Any cost burden to

respondents as a result of this collection are identified in item 14. There are no fee charges associated with the collection of this information.

14. **Annualized Cost Analysis:**

Printing Cost	\$ 18,000
Collecting and Processing	\$ 1,000,000
Total Cost to Program	\$ 1,018,000
Fee Charge	0
Total Annual Cost to Government	\$ 1,018,000

Government Cost

The estimated cost to the Government for the information collection is \$1,018,000. This figure is calculated by using the estimated number of respondents (100,000) x government response time of 15 minutes (.25) x \$40 (suggested average hourly rate for clerical, officer, and supervisory time with benefits). This figure also includes the estimated overhead cost for printing, stocking, and distributing the forms which is \$18,000.

15. There has been no increase or decrease in the estimated reporting burden hours for this collection of information.
16. USCIS does not intend to employ the use of statistics or the publication thereof for this collection of information.
17. In consideration of the large number of forms to be printed annually and the importance of the continual operation of the program, the USCIS is requesting approval to not display the expiration

date for OMB approval of this information collection. The USCIS believes it sagacious and extremely cost prohibitive to destroy, amend, reprint and distribute otherwise usable forms with the exception of outdated expiration dates. Additionally, as this form will be issued along with the corresponding Forms I-864 and I-864A, to have multiple forms with potentially different expiration dates would be confusing for the public, as well as difficult for the USCIS to coordinate and maintain accuracy of currency. Therefore, the USCIS requests that the display of the expiration date be waived.

18. The USCIS does not request an exception to the certification of this information collection. See attached item 19 of Form OMB 83-I.

B. Collection of Information Employing Statistical Methods.

Not Applicable.

C. Certification and Signature.

PAPERWORK CERTIFICATION

In submitting this request for OMB approval, I certify that the requirements of the Privacy Act and OMB directives have been complied with including paperwork regulations, statistical standards or directives, and any other information policy directives promulgated under 5 CFR 1320.

Richard A. Sloan

Director

Regulatory Management Division

Date